

ARGUMENTS/REMARKS

Claims 1-18 are pending. Claims 1, 5-8, 13, 17 and 18 were amended.

The amendments are supported by the specification, for example in paragraphs [0006]-[0011] and [0066] of the application as published. No new matter was added.

Rejection under 35 U.S.C. § 103

Claims 1-18 were rejected under 35 U.S.C. § 103(a) as obvious in view of Webb et al. (U.S. Patent Pub. No. 2002/0083342) (hereinafter “Webb”) and Seki (U.S. Patent Pub. No. 2003/0018753) (hereinafter “Seki”). It is respectfully submitted that the claims are not obvious for at least the following reasons.

These rejections and the associated assertions of the Office Action are respectfully traversed. However, in order to expedite the prosecution of this application, all of the independent claims have been amended to more clearly distinguish the art relied upon. By way of example, claim 1 has been amended to recite:

receiving a selection request from the remote user;
receiving content from the device ~~one or more devices on the home network~~ using a content protocol[[,]] and without accessing a web server; ~~wherein the content or services includes one or more of photos, music, documents, videos, games, or video or image data from one or more Internet cameras;~~ and
providing content or services to the remote user according to the selection request, wherein the receiving, verifying, generating and providing are performed by one or more devices of the home network.

Requiring each device in a home network to include a Web server in order to share content would present problems for a user of a home network, as noted in the present application:

[0006] One possible way to allow the content to remain in the home, secure, and still allow Internet users to access it, would be for the consumer to **host his own web server**, e.g., on a personal computer ("PC") in his or her home. However, this solution would have at least the following requirements: (1) a dedicated PC running web server software; (2) an Internet gateway that supports

network address translation ("NAT") and a firewall, and **(3) the expertise to install and configure this equipment and servers.**

[0007] All of these requirements are potentially problematic for a typical user. The last requirement is beyond the expertise of the vast majority of consumers.

(Emphasis Added).

Other drawbacks of requiring a user of a home network to host a web server on a device in a home network are described in the present application as follows:

[0008] Although the gateway provides the ability for multiple devices/PCs to gain access to the Internet, the devices/PCs are hidden in the home network from the Internet. If a consumer wants to share content from a PC/device behind the gateway to remote Internet users, the tasks of configuring the gateway properly to do port forwarding through NAT, which deals with mapping a selected port or protocol to a particular PC/device, and configuring the firewall to allow access to this PC on the home network, would be quite daunting for the casual consumer. The consumer would also need to install and configure the necessary servers on the PC/device to share the appropriate content.

[0009] The content would need to reside on a dedicated web server device and this device would need to remain on at all times. In order to secure the content on the web server, the web server would need to use authentication, which the consumer would need to configure with usernames and passwords. However, this database of usernames and passwords is usually only for a single device. It is not a common database used by all devices/PCs in the home network.

Because of these drawbacks of the prior art, some implementations described in the present application allow a device in a home network to share content without requiring the device to run a web server:

[0011] Method and devices are provided for to simplify, for the user of a home network, the sharing of content with remote users. Some such implementations allow remote users who have logged into the home network to have access to devices and services within the home network. Access to such content, devices and services may be controlled by running a content protocol client on the home network that handles file sharing. This content protocol client could be any suitable type known to those of skill in the art, such as Windows networking (smb), UPnP, etc. Alternatively, the content protocol client could be a proprietary content protocol client. Some implementations of the invention provide solutions for sharing multiple devices within the home network in a grouping to a particular remote user who logs into the home network in a secure fashion.

The specific examples of content protocols noted in paragraph 11 of the published application are now recited in claims 5 and 17. For example, claim 5 now recites:

The computer-readable medium of claim 3, wherein the second protocol is one of Windows networking (smb) or UPnP ~~a content protocol~~.

The Office Action acknowledges that “Webb does not specifically disclose receiving content from one or more devices on the home network using a content protocol.” (p. 4, l. 1-2). Applicant agrees with this assessment of Webb. Nowhere does Webb disclose or suggest “receiving content from the device using a content protocol,” as recited in claim 1.

Further, Webb states that “Each of the devices connected to the private network 16 includes an on-board Web server that allows a user to perform various configuration, troubleshooting, and/or administrative functions with respect to the device.” (§ [0043]). Thus, each of the devices in Webb’s private network is required to include an on-board Web server that uses HTTP to serve files that form Web pages. Accordingly, Webb also fails to disclose or suggest receiving content from a second device on the home network “receiving content from the device using a content protocol ***and without accessing a web server***” as recited in claim 1.

Seki fails to cure the deficiencies of Webb. First, Applicant respectfully submits that the Office Action has not shown that that Seki discloses or suggests receiving content from a device using a content protocol. The Office Action states:

Seki discloses receiving content from one or more devices on the home network using a content protocol. [i.e. content data is transmitted and displayed on remote terminal] [Abstract; and paragraphs 0005, 0105 and 0111, 0132 and 0137].

(p. 4, l. 3-5).

The above-quoted passage of the Office Action seems to suggest that “receiving content from one or more devices on the home network using a content protocol” is analogous to “content data is transmitted and displayed on remote terminal” as described in the cited passages of Seki. Applicant disagrees for the following reasons.

Content protocols include, for example, Windows networking (smb), UPnP, etc, as described in, for example, paragraph [0011] of the application. HTTP is different from a content protocol, as is made clear in for example, paragraph [0015] of the application.

Paragraphs [0132] and [0137] of Seki, for example, which are cited in the above-quoted passage of the Office Action, make no mention of receiving **anything** using a **content protocol**. For example, paragraph [0132] of Seki relates to displaying a data file on the remote terminal. However, paragraphs [0131]-[0132] of Seki clarifies that the data file is transmitted using the HTTP protocol, which is not a content protocol, as discussed above. As another example, paragraph [0137] of Seki states that “The remote terminal displays the received data file on the display using the Web browser (ST415).” However, paragraphs [0136]-[0138] of Seki clarify that the remote terminal communicates with the proxy server using the HTTP protocol, which is not a content protocol, as discussed above. Thus, paragraphs [0132] and [0137] of Seki do not disclose or suggest “receiving content from the device using a content protocol,” as recited in claim 1.

Content may include, for example, “photos, music, documents, videos, data from Internet cameras, etc.,” as described in paragraph [0005] of the application. “The amount of digital content to be shared by the home network may be in the terabytes.” (§ [0005]). Transmitting control commands, as described in Seki, fails to disclose or suggest “receiving content from the device using a content protocol,” as recited in claim 1.

For example, paragraphs [0005], [0105], and [0111] of Seki, cited in the above-quoted passage of the Office Action, mention different protocols. However, these passages seem to relate to transmitting/receiving **commands**, not receiving **content**. For example, paragraphs [0006]-[0007] of Seki seem to relate to transmitting control commands using the protocols

mentioned in paragraph [0005]. Similarly, paragraphs [0105]-[0106] seem to relate to transmitting control commands using the protocols mentioned in paragraph [0105]. Paragraph [0111] of Seki states that “Command transmitting/receiving control section 22 assembles a control command corresponding to protocol (for example, IEEE1394 or ECHONET) applied to the home network to which the home-network apparatus is connected.” Thus, paragraphs [0005], [0105], and [0111] of Seki describe receiving commands, not content. Therefore, paragraphs [0005], [0105], and [0111] of Seki fail to disclose or suggest “receiving content from the device using a content protocol,” as recited in claim 1.

Therefore, although Seki does separately discuss receiving a document using the HTTP protocol *and* receiving control commands using different protocol, Seki fails to disclose or suggest “receiving **content** from the device **using a content protocol**,” as recited in claim 1. (Emphasis Added).

Moreover, Seki fails to disclose or suggest receiving content from the device using a content protocol “***and without accessing a web server***,” as recited in claim 1. Instead, Seki discloses “a remote control proxy method and apparatus for remotely controlling controlled apparatus on a home network from an external network,” as described in paragraph [0002] of Seki.

As discussed above, Seki does disclose receiving a data file transmitted from a gateway using the HTTP protocol. However, since the data file described in Seki is transmitted using the HTTP protocol, the data file is received by accessing a web server on the device. Thus, the description in Seki related to receiving a data file fails to disclose or suggest receiving content “using a content protocol ***and without accessing a web server***” as recited in claim 1.

Seki also describes receiving, for example, a “control request,” “commands,” or “control contents” using different protocols (§ [0109], [0110], [0137]). However, there is no teaching or suggestion in Seki of receiving what would normally be considered “content” where the content is not received by accessing a web server. The application makes clear that “content may include, for example, “photos, music, documents, videos, data from Internet cameras, etc.” and that the amount of such content to be shared may be in the terabytes (§ [0005]). As discussed above, transmitting/receiving control commands is not the same as receiving content.

Therefore, although Seki does discuss receiving a document using the HTTP protocol *and* receiving commands using different protocols, Seki fails to disclose or suggest receiving

content from the device using a content protocol “*and without accessing a web server*”” as recited in claim 1.

Therefore, even if one of skill in the art would have been motivated to combine Webb and Seki (which has not been established and which Applicants do not admit), this combination would not disclose all elements recited in claim 1.

All other independent claims have been amended to recite features similar to claim 1 and, therefore, are not obvious for at least the reasons set forth above. The dependent claims include all of the elements of the independent claims on which they are based and, therefore, are not obvious for at least the reasons set forth above. Accordingly, it is respectfully requested that all rejections of the pending claims be withdrawn.

CONCLUSION

Applicants believe that all pending claims are allowable and respectfully request a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

The Commissioner is hereby authorized to charge any additional fees, including any extension fees, which may be required or credit any overpayment directly to the account of the undersigned, No. 50-4480 (Order No. CISC347).

Respectfully submitted,
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